

Zabaneh, Mahfouz

From: Choe, Michael@DTSC <Michael.Cho@dtsc.ca.gov>
Sent: Thursday, September 12, 2013 5:13 PM
To: Zabaneh, Mahfouz
Cc: Tipling, Carole@DTSC; Nieto, Edward@DTSC; Blum, Phil@DTSC; Vakili, Farshad@DTSC; Bailey, Peter@DTSC; Lucero, Loni@DTSC; Wong, Alfred@DTSC
Subject: FW: EPA ANALYSIS
Attachments: The 2018 RENEWAL Tab.docx

Hi Mike,

Our Estor unit and contractor has reviewed your 2018 table and discussion with us, come up with suggested changes to your 2018 GPRA list. We would like to meet/conference call with you to discuss so we can have a finalized table for you to submit to your HQ.

Please see attached table and comment from Schumin Wong below. Please let us know when you can meet with us to discuss and finalize the table. Thanks.

From: Wong, Schumin@DTSC
Sent: Wednesday, September 11, 2013 10:20 PM
To: Choe, Michael@DTSC; Bailey, Peter@DTSC; Tipling, Carole@DTSC
Cc: Anne Happel; Khang, Zer@DTSC; Nies, Sandra@DTSC
Subject: RE: EPA ANALYSIS

Good afternoon,

We have reviewed the Initial and Renewal 2018 baseline lists provided by USEPA to DTSC. Please find our analysis and recommended actions attached. As was discussed in the last meeting, EcoInteractive used the following logic and assumptions to produce this list:

LOGIC:

Renewal 2018 – our assumption is that the objective is to identify all Units that have been permitted and where the permit expires before 10/1/2018.

Includes all Units that meet the following criteria:

- Facility is within the 117 authorized facility list **AND**
- Unit is has not been issued closure (has not completed a closure activity; NOT just Legal Operating Status of CC or CP) **AND**
- Unit is has an approved permit and/or permit renewal **AND**
- Permit type is RCRA (or blank) **AND**
- The permit expiration date is **before 10/1/2018**.

Initial 2018 – Assumption is that the objective is to identify all Units that currently have not been included in a permit or issued closure.

Includes all Units that meet the following criteria:

- Unit s that have not been issued closure (has not completed a closure activity; NOT just Legal Operating Status of CC or CP) **AND**
- Unit does was never included in an approved permit and/or permit renewal

Using the rules above, the following lists and suggested actions were generated:

Renewal 2018

Remove from the EPA Renewal 2018 Baseline list the following:

- Units are currently permitted and permit will expire **after 10/1/2018**
- Units that have been issued closure (has a completed a closure activity; NOT just Legal Operating Status of CC or CP)
- Units referred to Corrective Action for closure
- Units that are now permitted under a standardized permit (no longer RCRA)

Add to the EPA Renewal 2018 Baseline list:

- Units currently permitted AND current permit will **expire before 10/1/2018**. These units will need either a renewal or closure activity.
- Units that are currently listed in the "EPA Initial Tab" but meet our criteria for Renewal, meaning that have a permit/renewal that will expire before 10/1/2018.

Initial 2018

Remove from the EPA Initial 2018 Baseline list the following:

- Units that have been included in an approve permit/renewal. **If a Unit has approved permitted/renewal AND the permit will expire before 10/1/2018, Unit should be moved to the "Renewal 2018" list.**
- Units that have been issued closure (has a completed a closure activity; NOT just Legal Operating Status of CC or CP)
- Units that have been referred to Corrective Action for closure.

Add to from the EPA Initial 2018 Baseline list the following:

- Units currently not closed AND do not have a an approved Permit.

As you can see from the attachment, we have an extensive list of changes to the EPA Renewal and Initial 2018 Baseline list originally provided for analysis. I'm concern that perhaps this means that our assumption on the objective of the lists was incorrect. Can we schedule some time to discuss with Mike Z or their HQ counterpart to get EPA input? We would like to get this resolved ASAP as the end of the fiscal year is very near.

Schumin Wong
Chief
Data Systems Unit
(916) 323-3399

From: Anne Happel [<mailto:ahappel@ecointeractive.com>]

Sent: Thursday, September 05, 2013 12:18 PM

To: 'Anne Happel'; Choe, Michael@DTSC; Wong, Schumin@DTSC; Nies, Sandra@DTSC

Cc: Bailey, Peter@DTSC; Tipling, Carole@DTSC

Subject: RE: EPA ANALYSIS

1. If units have been referred to CA – should these units be removed from the GRPA RENEWAL LIST? Yes
2. Units that will be renewed as STANDARDIZED. How do we show this facility is converted to PICV – Anne will outline proposed changes to enter in ES
3. Should DTSC add units to Units that need data cleanup to Initial list? For authorized add to renewal unless these are STD facilities
4. For non-authorized add undergoing closure units
5. Anne DRAFT email for USEPA

From: Anne Happel [<mailto:ahappel@ecointeractive.com>]
Sent: Thursday, September 05, 2013 11:09 AM
To: 'Choe, Michael@DTSC'; 'Wong, Schumin@DTSC'; 'Nies, Sandra@DTSC'
Cc: 'Bailey, Peter@DTSC'; 'Tipling, Carole@DTSC'
Subject: RE: EPA ANALYSIS

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From: Choe, Michael@DTSC [<mailto:Michael.Cho@dtsc.ca.gov>]
Sent: Thursday, September 05, 2013 9:54 AM
To: Wong, Schumin@DTSC; Anne Happel; Nies, Sandra@DTSC
Cc: Bailey, Peter@DTSC; Tipling, Carole@DTSC
Subject: RE: EPA ANALYSIS

We can't do at 1:30 today. Best time would be between 11:00-12:00. I am thinking this discussion should take no more than 30min at most. Please let us know. Thanks.

From: Wong, Schumin@DTSC
Sent: Thursday, September 05, 2013 9:33 AM
To: Choe, Michael@DTSC; Anne Happel; Nies, Sandra@DTSC
Cc: Bailey, Peter@DTSC; Tipling, Carole@DTSC
Subject: RE: EPA ANALYSIS

Good morning,

Anne and I have a meeting at 10 AM. Can we all discuss this at 1:30?

Schumin Wong
Data Systems Unit
(916) 323-3399

From: Choe, Michael@DTSC
Sent: Thursday, September 05, 2013 9:16 AM
To: Anne Happel; Nies, Sandra@DTSC; Wong, Schumin@DTSC
Cc: Bailey, Peter@DTSC; Tipling, Carole@DTSC
Subject: RE: EPA ANALYSIS

Anne, can we talk 9:30 this morning? Carole and Peter should join as well.

From: Anne Happel [<mailto:ahappel@ecointeractive.com>]
Sent: Wednesday, September 04, 2013 5:23 PM

To: Choe, Michael@DTSC; Nies, Sandra@DTSC; Wong, Schumin@DTSC
Subject: EPA ANALYSIS

Please see the enclosed spreadsheet. We will need to discuss this!!

Thank you,
Anne Happel